

CALFRESH (CF) PROGRAM **REQUEST FOR POLICY/REGULATION INTERPRETATION**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input checked="" type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 4/20/17	NEED RESPONSE BY: 5/1/17
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: San Diego County	
3. PHONE NO.:	7. SUBJECT: CalFresh	
4. REGULATION CITE(S): ACL 13-79	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). All County Letter 14-56	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Do CalFresh households of 3 or more persons qualify for the new CalFresh Modified Categorical Eligibility Program if their income is under 200% of the Federal Poverty Level?

10. REQUESTOR'S PROPOSED ANSWER:

Not Sure:

The County takes the position that California has opted to deny MCE to households of 3 or more persons. County cites the following language from All County Letter No. 14-56:

California opted to deny benefits to Modified Categorical Eligibility households of 3 or more persons where the household's net income exceeds the limits set by regulation.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Yes they qualify as long as their income is under the 200 percent limit and they receive the PUB 275.

Per ACIN I-50-13, FNS allows states the option of denying an application or certifying the household if the household is eligible to a zero benefit case. California has opted to deny such cases. This includes households of three or more who are otherwise CE or MCE. This ONLY applies to zero benefit cases, not cases where the household is eligible for benefits.

FOR CDSS USE

DATE RECEIVED:

April 20, 2017

DATE RESPONDED TO COUNTY/ALJ:

May 2, 2017 (WEB)